

Message

From: Repine, Damon [RepinedL@cdmsmith.com]
Sent: 3/24/2016 6:08:29 PM
To: Cirian, Mike [Cirian.Mike@epa.gov]
Subject: FW: CFAC ground water sampling rationale/ IDW comments

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From: Repine, Damon
Sent: Thursday, February 25, 2016 3:50 PM
To: Epa, Mike (cirian.mike@epa.gov) <cirian.mike@epa.gov>
Cc: Repine, Damon <RepinedL@cdmsmith.com>
Subject: CFAC ground water sampling rationale/ IDW comments

Good afternoon Mike,
Please find attached CDM Smith's comments to the IDW management plan.
Also below is the sampling rational that you may want to consider to discuss with Glencore and Roux.

As far as the rationale for collecting groundwater samples prior to completion of all wells is concerned, it is our opinion that additional data gaps could be identified during the well construction activities, and new wells (if necessary) could be planned and installed without further mobilization. For example, additional personnel would develop and sample newly constructed wells behind the drill rig as installation progresses. Samples collected could be analyzed on a short turn-around time (24-48 hours). This way, data could be evaluated during the well construction phase. If data gaps were identified by this evaluation, the rig could be used to install additional wells without having to go back to the office, write an additional work plan, and pay for another mobilization. This technique could possibly save a step or two in the investigation process. That being said, this methodology would not replace the synoptic "temporal snapshot" sampling event at the completion of well construction.
The CDM Smith technical team will be available for discussion if you have any questions.

Thank you,

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